11/15/78- Jim, re: Halperd v Mardin-

175- 4, records: direct comparison in letters, one is accidently seen that misfiles in Archives in which archives gets SS to rephrase what they have written about my requests. We should remember this for when in court on claiming suit.

Axelrad-seems to be a FOI specialist, figuring in other suits also. I think in Ivy now, too, and Nichols'.

175 note this persistent dependence upon Duchinsky, here said misplaced, as with us.

177 ortwein's first paragraph on Duchinsky is worth remembering because of the limitation it imposes on interpretation of significance, which is other than DJ's.

Did they not also cite the reversed Bristol-Myers opinion?

179 The Bristol-Myers interpretation of law-enforcement exemption is very narrow, bottoming it to only -emphasis - "premature discovery", i.e., not even discovery when there is nothing before a court.

II (4) Here is a parallel, in arguing before Gessell, to ask that all negotiations on the latter agreement and memo transfer be produced in camera. Here, in addition, the Clark memo on what a plaintiff can know should be invoked.

179-no blanket on interagency relevant to Arch-SS corres; letter-agreement, memo transfer arguments.

And, although it is under "interagency", there is this that is so relevant in spectro, I'm surprised you didn't turn it:

"Purely scientific, factual reports and scientific studies cannot be cloaked in secrecy by an exemption..." and here it goes into the intent of the exemption, the real intent.